

**Amendments to the Drawings:**

The attached sheet of drawings includes changes to FIG. 3G. This sheet, which includes FIG. 3G, replaces the original sheet including FIG. 3G. In amended FIG. 3G, arrows have been added to represent the direction of expansion of the inflatable bladder and the resulting direction of force produced on the door, in accordance with exemplary embodiments of the invention.

Attachment: Replacement Sheet

## **REMARKS/ARGUMENTS**

1. Claims 1, 4-12, 18-21, 23-26, 30-34, 39, 40, and 44-47 were pending. **Claims 1, 5, 7, 8, 9, 10, 19, 21, 26, 30, 31, 32, 34, 39, 44, 45, and 47 are being amended. Claims 4 and 18 are being canceled.** Thus, claims 1, 5-12, 19-21, 23-26, 30-34, 39, 40, and 44-47 are now pending. Also, FIG. 3G is being amended, and the specification is being amended to represent changes in amended FIG. 3G. Applicants respectfully request reconsideration of the application in view of the above amendments and the following remarks/arguments.

2. The Examiner rejected claims 1, 4, 7-12, 18, 21, 23-26, 30, 31, 34, 39, 40, 44, and 47 under 35 U.S.C. 102(b) as being anticipated by Mena, but indicated that claims 5, 6, 19, 20, 32, 33, 45, and 46 include allowable subject matter.

In accordance with the claimed invention, a latching mechanism engages to hold the door in a closed position and a movable member (e.g., an inflatable bladder coupled to the door) produces a net outward force on the door, which operates to keep the door latched. The door may include a handle for manual operation of the latching mechanism, particularly for manual disengagement of the latching mechanism. The latching mechanism may include undercut or interlocking features that reduce the chance of someone manually disengaging the latching mechanism while the movable member is applying the force. The movable member may act on an intermediate element, such as a pump cassette, to produce the net outward force on the door.

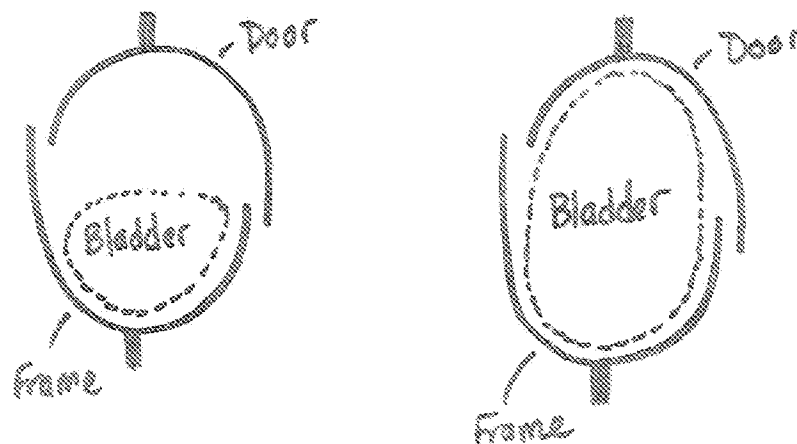
Mena lacks a latching mechanism, separate from his inflatable bladder, that engages to hold the door in the closed position and that is made inoperable by the inflated bladder. In fact, Mena expressly excludes such a latching mechanism because such a latching mechanism might delay or prevent opening of the door in an emergency situation:

Conventionally, such escape hatches may be retained in closed position by a manually operable latching or locking mechanism, whose actuation or release may be sufficiently difficult or inconvenient to effectively prevent opening of the

closure under emergency conditions rapidly enough to save the occupants of the vehicle, craft, or the like ... The present invention provides an improved locking arrangement for retaining a hatch or other closure element in closed position very positively, but in a manner enabling extremely rapid and easily controlled release of the closure from a surrounding structure when desired. Preferably, the locking unit when released frees the closure for complete detachment from the surrounding structure to thus leave the opening completely unobstructed (Mena, column 1, lines 18-33).

Thus, Mena's door is essentially a free-floating door that can be freely opened and closed while the bladder is deflated and that is held closed solely by inflating the bladder without the use of a latching mechanism.

Furthermore, Mena's inflated bladder produces a net inward force, rather than a net outward force, on the door (if a net outward force was produced, then the door would tend to open, since Mena includes a free-floating door and lacks a latching mechanism to hold the door in a closed position absent the inflated bladder). It is true, as the Examiner shows in the attachment to the Office action, that the bladder expands in all directions. Inflation of Mena's bladder, however, pulls the door inward toward the frame in order to lock and seal the door. The following drawings, from Applicants' response dated December 16, 2005, are representative of the door locking mechanism of Mena:



In the above figures, the frame component corresponds to the annular portion 25 of part 18 shown in FIG. 2 of Mena, while the door component corresponds to the annular rim 30 of hatch 14 shown in FIG. 2 of Mena; the door opens to the right in the above figures. In an unlocked state (shown on the left), the bladder is deflated and the door is able to open and close freely (see, for example, Mena, column 3, lines 17-23 regarding closing the door with the bladder deflated, as well as Figures 2 and 3). There is no latching mechanism to hold the door in a closed position. Portions of the door extend beyond (i.e., overlap) corresponding portions of the frame so that the door can only swing to one side of the frame and therefore is not required to (and cannot) move beyond the frame in order to open and close (see, for example, Mena, column 2, lines 52-65). In a locked state (shown on the right), the bladder is inflated and fills the space between the door and the frame so as to pull the door closed (i.e., the net force on the door is to the left) and prevent the door from opening (see, for example, Mena, column 3, lines 28-37).

Thus, Mena lacks a latching mechanism that holds the door in a closed position and a movable member that applies a net outward force on the door so as to prevent disengagement of the latching mechanism. That being said, the Examiner has indicated that claims 5, 6, 19, 20, 32, 33, 45, and 46 include allowable subject matter. For the sake of expediency, Applicants have chosen to accept the subject matter deemed allowable by the Examiner. Therefore, Applicants have amended claims 5, 19, 32, and 45 into

independent form including the limitations from their respective base claims. Dependent claims 6, 20, 33, and 46 are allowable without change.

Applicants therefore respectfully submit that claims 5, 6, 19, 20, 32, 33, 45, and 46 are now in allowable form.

Applicants have also amended claim 1 to focus on a door locking mechanism having a latching mechanism and a movable member coupled to the door, with further amendments to remove or omit limitations that are ancillary to such a door locking mechanism (such as undercut features and a handle). Applicants note that original claim 8 provided for the movable member to be coupled to the door. Mena clearly does not disclose a movable member coupled to the door for producing a force on the door toward an opening direction of the door, as required by the claim. Rather, Mena's movable member is coupled to the frame and produces a net force on the door toward a closing direction of the door. Thus, Applicants respectfully submit that amended claim 1 is allowable over Mena.

In relation to amended claim 1, Applicants have amended claims 7 and 8 to incorporate an intermediate element, such as a pump cassette, positioned between the movable member and the assembly, per allowable claims 19 and 20; amended claim 9 to incorporate a handle, per allowable claim 5; amended claim 10 for consistency with claim 24; and canceled claims 4 and 18 without prejudice.

Applicants have also amended claims 21, 34, and 47 to comport with amended claim 1. For the reasons stated above with regard to amended claim 1, Applicants respectfully submit that amended claims 21, 34, and 47 are allowable.

In relation to amended claims 21 and 34, Applicants have amended claims 23 and 26 for consistency with claim 21; amended claims 30, 31, and 44 to incorporate an intermediate element, such as a pump cassette, positioned between the movable means and the assembly, per allowable claims 19 and 20; and amended claim 39 for clarity.

Applicants therefore respectfully submit that claims 1, 7-12, 21, 23-26, 30, 31, 34, 39, 40, 44, and 47 are now in allowable form and furthermore that these claims fall within the general scope of the subject matter deemed allowable by the Examiner and therefore will not require additional search or consideration by the Examiner.

3. The Examiner rejected claims 1, 4-12, 18-21, 23-26, 30-34, 39, 40, and 44-47 under 35 U.S.C. 112, second paragraph, as being indefinite.

Applicants have amended the claims to clarify that the force applied to the door is toward an opening direction of the door.

4. The Examiner objected to the drawings for failing to show the force applied by the movable member.

Applicants have amended FIG. 3G to include arrows representing the direction of expansion of the inflatable bladder and the resulting direction of force produced on the door, in accordance with an exemplary embodiment of the invention.

5. All pending claims are believed to be in a form suitable for allowance. Therefore, the application is believed to be in a condition for allowance. The Applicant respectfully requests early allowance of the application. The Applicant requests that the Examiner contact the undersigned, Jeffrey T. Klayman, if it will assist further examination of this application.

6. Applicants petition for a three month extension of time. In the event that a further extension is needed, this conditional petition of extension is hereby submitted, and Applicants request that deposit account number 19-4972 be charged for any fees that may be required for the timely consideration of this application.

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Respectfully submitted,



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